

June 6, 2001

IN RE: DOCKET NO. 2001-65-C – **BELLSOUTH
TELECOMMUNICATIONS, INC.** – Generic Proceedings to establish
prices for BellSouth Telecommunications, Inc.'s Interconnection
Services, Unbundled Network elements and other related elements and
services

**COPY OF LATE FILED EXHIBITS OF D. DAONNE CALDWELL,
CYNTHIA K. COX, WILLIAM P. GREER, AND W. BERNARD SHELL
ON BEHALF OF BELLSOUTH TELECOMMUNICAITONS, INC. HAS
BEEN DISTRIBUTED TO THE FOLLOWING:**

Legal (2)

Commissioners (7)

pao

L³C⁷



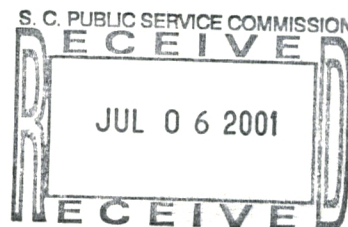
Post Office Box 752
Columbia, South Carolina 29202-0752
Telephone: 803/401-2900
Fax: 803/254-1731
E-mail: caroline.watson@bellsouth.com
IPager: cwatson2@imcingular.com

Caroline N. Watson
General Counsel - South Carolina

Street Address:
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201

July 6, 2001

The Honorable Gary E. Walsh
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211



Re: Generic Proceeding to Establish Prices for
BellSouth Telecommunications, Inc.'s
Interconnection Services, Unbundled Network
Elements and Other Related Elements and Services
Docket No.: 2001-65-C

Dear Mr. Walsh:

Enclosed for filing please find the original and 15
copies of the Late Filed Exhibits of D. Daonne Caldwell,
Cynthia K. Cox, William H. P. Greer, and W. Bernard Shell.

By copy of this letter, I am serving by hand delivery
these late filed exhibits to all parties of record through
local representatives as directed by this Commission.
Counsel outside of the local area will be provided their
service by way of United States mail.

Legal has also
retained 8 copies
to distribute to
Commissioners

Legal retained
(3) copies
- held per Flo
7/6



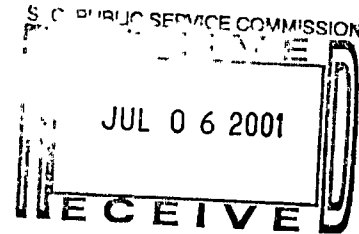
Post Office Box 752
Columbia, South Carolina 29202-0752
Telephone: 803/401-2900
Fax: 803/254-1731
E-mail: caroline.watson@bellsouth.com
IPager: cwatson2@imcingular.com

Caroline N. Watson
General Counsel - South Carolina

Street Address:
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201

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Re: Generic Proceeding to Establish Prices for
BellSouth Telecommunications, Inc.'s
Interconnection Services, Unbundled Network
Elements and Other Related Elements and Services
Docket No.: 2001-65-C

Dear Mr. Walsh:

Enclosed for filing please find the original and 15
copies of the attachments to Exhibit No. 14 which were
inadvertently omitted from our original filing earlier this
day.

By copy of this letter, I am serving by via facsimile
these attachments to all parties of record.

Sincerely,

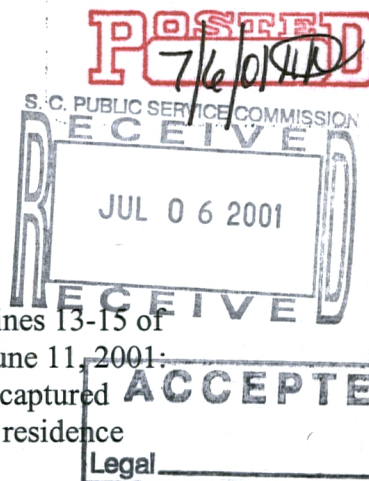
Caroline N. Watson *by nml*

CNW/nml

Enclosure

cc: All Parties of Record

BellSouth Telecommunications, Inc.
South Carolina Public Service Commission
Docket No. 2001-65-C
Late-Filed Exhibit
June 19, 2001
Hearing Exhibit No. 14
Page 1 of 1



REQUEST: Provide support for the following statement on page 17, lines 13-15 of BellSouth witness Cindy Cox's rebuttal testimony filed June 11, 2001: "BellSouth estimates that CLECs in South Carolina have captured approximately 20% of the business market and 4% of the residence market."

RESPONSE: Please see the attached documents which were provided as Exhibits JAR-8 and JAR-9 to BellSouth witness John Ruscilli's direct testimony filed on May 16, 2001 in SCPSC Docket No. 2001-209-C. The data provided is as of March 2001.

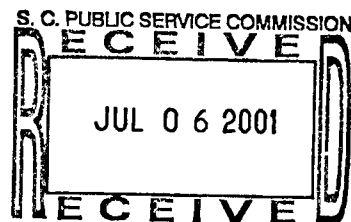
Ms. Cox's reference to "20% of the business market" is calculated by dividing the total estimated CLEC business lines by the total of all business lines in South Carolina (in the areas that BellSouth serves). Likewise, Ms. Cox's reference to "4% of the residence market" is calculated by dividing the total estimated CLEC residence lines by the total of all residence lines in South Carolina (in the areas that BellSouth serves).

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**CLECs with Over 10 Lines
in BellSouth SOUTH CAROLINA Area
METHOD ONE**

**Exhibit JAR-8
Redacted for
Public Inspection**

SOUTH CAROLINA MARCH 2001 Status	Resold Lines		----- Estimated ----- Facilities-based Lines			Total Local Lines
	RES	BUS	RES	BUS	TOTAL	
Facilities-Based [10+ Lines]						
1 ACCESS INTEGRATED NETWORKS						
2 ACCESS POINT, INC.						
3 ADELPHIA BUS. SOLUTIONS (Hyperion)						
4 ALLTEL COMMUNICATIONS						
5 AT&T COMMUNICATIONS (incl TCG)						
6 BIRCH TELECOM						
7 BROADSLATE NETWORKS						
8 BUSINESS TELECOM (BTI) (incl FiberSouth)						
9 COVAD COMM (incl BLUESTAR)						
10 CRG INTERN'L dba NETWORK ONE						
11 DSLNET COMMUN.						
12 E.SPIRE COMM. (ACSI)						
13 GLOBAL CROSSING TEL. (incl. FRONTIER)						
14 ICONNECT 'CONNECTSOUTH COMM)						
15 ITC'DELTACOM						
16 KMC TELECOM INC.						
17 KNOLOGY (incl. TTE)						
18 LCI INTERNATIONAL TELECOM (dba Qwest)						
19 NETWORK TELEPHONE (incl. LightNetworks)						
20 NEW SOUTH COMM. (incl. UniversalCom)						
21 PBT COMMUNICATIONS						
22 THE OTHER PHONE (dba AccessOne,Talk.com)						
23 TRIVERGENT - NUVOX (STATE COMMUN.)						
24 US LEC						
Facilities-Based Total - Method One	9,754	16,238	2,425	89,106	91,531	117,523



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**CLECs with Over 10 Lines
in BellSouth SOUTH CAROLINA Area
METHOD ONE**

**Exhibit JAR-8
Redacted for
Public Inspection**

SOUTH CAROLINA MARCH 2001 Status	Resold Lines		Estimated Facilities-based Lines			Total Local Lines
	RES	BUS	RES	BUS	TOTAL	
Resale Only (10 + Lines)						
1-800 RECONEX, INC.						
2-ALTERNATIVE PHONE						
3-AM-TEL (dba Phone Center Commun.)						
4-ANNOX, INC						
5-AVANA COMMUNICATIONS						
6-BRYANTS WIRELESS SERVICES						
7-BUDGET PHONE, INC						
8-CAT COMMUNICATIONS INT'L (CCI)						
9-CHOCTAW TELECOM (dba Smoke Signal Comm.)						
10-CAL TONE & MORE						
11-DL-TELECONNECT						
12-DPTALK COMMUNICATIONS						
13-EZ TEL						
14-E-ZZ PHONES (aka New Dimension Commun.)						
15-FAST TEL. (GA National Acc.)						
16-FIRST CONNECTION						
17-GLOB COMMUN. (aka HTR&L ENTERPRISES)						
18-HART CEDIA COMM. (ICI) (incl. Phone One)						
19-INTERM. COMMUNICATIONS						
20-MAX-TEL ATS (incl WTI, MFS)						
21-MCL METRO TELECOMM., LLC						
22-NAVIGATOR (Image Access dba)						
23-NEWPHO COMMUN. (incl Tel-Link)						
24-NOWSOT COMMUNICATIONS						
25-ONE-POINT TELECOM						
26-ONETONE, INC						
27-PHONE LINE CARRIER SERVICES						
28-PREFERRON PAGING & COMMUN.						
29-PUSHBUT SOUTH CAROLINA NET						
30-TELE CONE						
31-T-ZAK WIRELESS (dba Talk Now USA)						
32-UNIVERSAL TELECOM INC						
33-USA TELECOM (INT'L DESIGN GRP dba)						
Resale-only (10 + Lines) SUBTOTAL	32,218	904	-	-	-	33,122

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**CLECs with Over 10 Lines
in BellSouth SOUTH CAROLINA Area
METHOD ONE**

**Exhibit JAR-8
Redacted for
Public Inspection**

SOUTH CAROLINA MARCH 2001 Status	Resold Lines		----- Estimated -----			Total Local Lines
			Facilities-based Lines			
	RES	BUS	RES	BUS	TOTAL	
METHOD ONE TOTAL -->	41,972	17,142	2,425	89,108	91,531	150,645
			---- METHOD 1 ESTIMATE ----			

Total	
Resold -->	59,114

CLECs Over 10 Lines - MARCH 2001	57
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FACILITIES-BASED CLECs ----->	24	← Method One
RESALE ONLY CLECs ----->	33	

METHOD 1 ESTIMATE

SOUTH CAROLINA - BELL SOUTH AREA	150,645
CLEC Share of Access Lines =	150,645 + 1,460,025

METHOD 1 ESTIMATE

= 9.4%

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**CLECs with Over 10 Lines
in BellSouth SOUTH CAROLINA Area
METHOD TWO: E911 + UNE-P**

**Exhibit JAR-9
Redacted for
Public Inspection**

SOUTH CAROLINA MARCH 2001 Status		Resold Lines		----- Estimated ----- Facilities-based Lines			Total Local Lines
Facilities-Based: METHOD 2		RES	BUS	RES	BUS	TOTAL	
1	ACCESS INTEGRATED NETWORKS						
2	ACCESS POINT, INC.						
3	ALLTEL COMMUNICATIONS						
4	AT&T COMMUNICATIONS (incl TCG)						
5	BIRCH TELECOM						
6	BUSINESS TELECOM (BTI) (incl FiberSouth)						
7	CRG INTERN'L dba NETWORK ONE						
8	E.SPIRE COMM. (ACSI)						
9	GLOBAL CROSSING TEL. (incl. FRONTIER)						
10	ITC*DELTACOM						
11	KMC TELECOM INC.						
12	KNOLOGY (incl. TTE)						
13	NEW SOUTH COMM. (Incl. UniversalCom)						
14	THE OTHER PHONE (dba AccessOne,Talk.com)						
15	TRIVERGENT - NUVOX (STATE COMMUN.)						
16	US LEC						
Totals based on E911 + UNE-P only		9,344	12,319	2,533	77,798	80,331	101,994

Other CLECs without E911 or UNE-P		Values below based on Method One					
1	ADELPHIA BUS. SOLUTIONS (Hyperion)						
2	BROADSLATE NETWORKS						
3	COVAD COMM (incl BLUESTAR)						
4	DSLNET COMMUN.						
5	ICONNECT (CONNECTSOUTH COMM)						
6	LCI INTERNATIONAL TELECOM (dba Qwest)						
7	NETWORK TELEPHONE (incl. LightNetworks)						
8	PBT COMMUNICATIONS						
Totals for Other CLECs							

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**CLECs with Over 10 Lines
in BellSouth SOUTH CAROLINA Area
METHOD TWO: E911 + UNE-P**

**Exhibit JAR-9
Redacted for
Public Inspection**

SOUTH CAROLINA MARCH 2001 Status		Resold Lines		----- Estimated ----- Facilities-based Lines			Total Local Lines
Resale Only [10 + Lines]		RES	BUS	RES	BUS	TOTAL	
1	1-800 RECONEX, INC.						
2	ALTERNATIVE PHONE						
3	AM-TEL (dba Phone Center Commun.)						
4	ANNOX, INC						
5	AVANA COMMUNICATIONS						
6	BRYANTS WIRELESS SERVICES						
7	BUDGET PHONE, INC						
8	CAT COMMUNICATIONS INT'L (CCI)						
9	CHOCTAW TELECOM (dba Smoke Signal Comm.)						
10	DIAL TONE & MORE						
11	DPI-TELECONNECT						
12	EZ TALK COMMUNICATIONS						
13	E-Z TEL						
14	FAST PHONES (aka New Dimension Commun.)						
15	FIRST TEL. (GA National Acc.)						
16	GLOBAL CONNECTION						
17	HART COMMUN. (aka HTR&L ENTERPRISES)						
18	INTERMEDIA COMM. (ICI) (incl. Phone One)						
19	MAX - TEL COMMUNICATIONS						
20	MCI METRO ATS (incl WTI, MFS)						
21	NAVIGATOR TELECOMM., LLC						
22	NEW PHONE (Image Access dba)						
23	NOW COMMUN. (incl Tel-Link)						
24	ONE POINT COMMUNICATIONS						
25	ONETONE TELECOM						
26	PHONE LINK INC						
27	PREFERRED CARRIER SERVICES						
28	PUSH BUTTON PAGING & COMMUN.						
29	SOUTH CAROLINA NET						
30	TELE CONEX						
31	T-ZAK WIRELESS (dba Talk Now USA)						
32	UNIVERSAL TELECOM INC						
33	USA TELECOM (INT'L DESIGN GRP dba)						
Resale-only (10 + Lines) SUBTOTAL		32,218	904	-	-	-	33,122

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**CLECs with Over 10 Lines
in BellSouth SOUTH CAROLINA Area
METHOD TWO: E911 + UNE-P**

**Exhibit JAR-9
Redacted for
Public Inspection**

SOUTH CAROLINA MARCH 2001 Status	Resold Lines		----- Estimated -----			Total Local Lines
			Facilities-based Lines			
	RES	BUS	RES	BUS	TOTAL	
METHOD TWO TOTAL -->	41,562	13,223	2,533	77,798	80,331	135,116
		----- METHOD 2 ESTIMATE -----				

Total	
Resold -->	54,785

CLECs Over 10 Lines - MARCH 2001	49
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FACILITIES-BASED CLECs ----->	16	← Method 2: E911 + UNE-P
RESALE ONLY CLECs ----->	33	

	METHOD 2 ESTIMATE
SOUTH CAROLINA - BELLSOUTH AREA	135,116
CLEC Share of Access Lines =	135,116 + 1,460,025
METHOD 2 ESTIMATE	= 8.5%

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STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND) DOCKET NO. 2001-65-C

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the Attachments to Exhibit No. 14 in Docket No. 2001-65-C, to be served by Via Facsimile to the following this July 6, 2001:

Elliott F. Elam, Jr., Esquire
S. C. Department of Consumer Affairs
3600 Forest Drive, 3rd Floor
Post Office Box 5757
Columbia, South Carolina 29250-5757
(Consumer Advocate)

Francis P. Mood, Esquire
Haynsworth Sinkler & Boyd
Post Office Box 11889
Columbia, South Carolina 29211-1889
(AT&T)

F. David Butler, Esquire
General Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)

Darra W. Cothran, Esquire
Carolyn C. Matthews, Esquire
Woodward, Cothran & Herndon
1200 Main Street, 6th Floor
Post Office Box 12399
Columbia, South Carolina 29211
(MCI WorldCom Network Service, Inc.
MCI WorldCom Communications and
MCI metro Access Transmission Services,
Inc.)

Russell B. Shetterly, Esquire
Haynsworth, Marion, McKay & Guerard, L.L.P.
Post Office Drawer 7157
Columbia, South Carolina 29202
(ACSI)

John F. Beach, Esquire
John J. Pringle, Jr., Esquire
Beach Law Firm
1321 Lady Street, Suite 310
Post Office Box 11547
Columbia, South Carolina 29211-1547
(TriVergent, AIN and SCPCA)

Marsha A. Ward, Esquire
Kennard B. Woods, Esquire
MCI WorldCom, Inc.
Law and Public Policy
6 Concourse Parkway, Suite 3200
Atlanta, Georgia 30328
(MCI)

Frank R. Ellerbe, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
1901 Main Street, Suite 1500
Post Office Box 944
Columbia, South Carolina 29202
(NewSouth Communications Corp.)

Robert Carl Voight
Senior Attorney
141111 Capital Blvd.
Wake Forest, NC 27587-5900
(Sprint/United Telephone)

Marty Bocock
Director of Regulatory Affairs
1122 Lady Street, Suite 1050
Columbia, South Carolina 29201
(Sprint/United Telephone Company)

Henry C. Campen, Jr., Esquire
Parker Poe Adams & Bernstein LLP
150 Fayetteville Street Mall
Suite 1400
Raleigh, North Carolina 27602
(Broadslate Networks of SC, Inc.
ITC^DeltaCom Communications, Inc.
KMC Telecom III, Inc.)

Faye A. Flowers, Esquire
Parker, Poe, Adams & Bernstein LLP
1201 Main Street, Suite 1450
Columbia, South Carolina 29202
(Broadslate Networks of SC, Inc.
ITC^DeltaCom Communications, Inc.
KMC Telecom III, Inc.)



Nyla M. Laney

PC Docs # 392707

BellSouth Telecommunications, Inc.
South Carolina Public Service Commission
Docket No. 2001-65-C
Late-Filed Exhibit
June 19, 2001
Hearing Exhibit No. 15
Page 1 of 1

REQUEST: Provide the number of resold lines versus facilities-based (UNE) lines in South Carolina.

RESPONSE: See response to Hearing Exhibit No. 14.

BellSouth Telecommunications, Inc.
South Carolina Public Service Commission
Docket No. 2001-65-C
Late-Filed Exhibit
June 19, 2001
Hearing Exhibit No. 16
Page 1 of 1

REQUEST: Assume that a CLEC is purchasing UNEs from BellSouth to serve its end user customer. When that end user disconnects its service, if BellSouth puts the line into connect-through status (meaning that the loop and the port remain connected to that location), does BellSouth bill the CLEC the nonrecurring disconnect charge(s) for the UNE(s)?

RESPONSE: Yes.

BellSouth Telecommunications, Inc.
South Carolina Public Service Commission
Docket No. 2001-65-C
Late-Filed Exhibit
June 20, 2001
Hearing Exhibit No. 29
Page 1 of 1 with Attachment

REQUEST: Please provide the source of the geographic descriptions used in the BSTLM, especially the terrain and soil descriptions found in DDC-6, pages 41 through 57.

RESPONSE: Please see the attached document.

BSTLM Geographic Data Sources

BSTLM uses multiple sources of geographic data. To ensure consistency, all geographic data are in NAD 83 format.

Many data sources originate from the U.S. Government and are re-formatted by Stopwatch Maps (St. Louis, MO) for use in the BSTLM.

Geographic Data Input	Description	Source
Census Blocks Demographics	A reference file used to describe the population in a given Census Block. This includes the number of Households, Housing Units, and Business Firms.	The source of this file is 1998 county growth estimates based upon Census Block actuals from 1990 United States Census. The number of business firm locations by Census Block was obtained from PNR (Jenkintown, PA).
Census Block Boundaries	A reference file of Census Block boundaries is used when we are attempting to locate BST customers whom we know "exist" but their location cannot be precisely determined or when we are trying to surrogate points for whom we know neither service information nor location (for example, unoccupied housing units)	The source of this file is Stopwatch Maps, based upon Census Bureau's TIGER® (Topologically Integrated Geographic Encoding and Referencing) data base of geographic information—1997.
County Boundaries	A reference file of County Boundaries is used, for example, when we are attempting to determine which roads lie in what wire center.	The source of this file is Stopwatch Maps, based upon 1997 TIGER® Data.
Roads	Reference files are used to describe the road network within a state	The source of these files is Geographic Data Technologies-Dynamap/2000 v9.0 03/11/99
Switch Locations	A reference file used to describe the locations of BellSouth Switches.	The source of this file is BellSouth Telecommunications—1998.

Geographic Data Input	Description	Source
Terrain Data	For each state, a file of terrain data is provided which becomes the source of terrain attributes for network elements. Terrain data includes soil type, rock hardness, water table depth, depth to bedrock.	<p>The source of this file is Stopwatch Maps, based upon 1991 STATSGO (US Dept of Agriculture)</p> <p>The area units for which terrain attributes are provided are rectangles 1/100th degree of latitude by 1/100th degree of longitude.</p> <p>For quantitative attributes (water table depth, bedrock depth) the assigned attribute is the weighted average for the rectangle. The weightings are based upon the percent of area assigned this particular terrain value.</p> <p>For qualitative attributes (soil type) the attribute assigned is the predominant attributed as determined by the percent of area assigned to this particular attribute.</p>
Zip+4 Centroid locations	A file of Zip+4 centroid locations is used to assign ZIP+4 centroid locations to those addresses for which the geocoder has failed to provide an adequate geocode ..	A file of Zip+4 centroid locations is proved by Stopwatch Maps. The file is based upon United States Postal Service data.
Wire Center Boundaries	A reference file used to describe the boundaries of BellSouth wire centers	The source of this file is BellSouth Telecommunications – December 1998

BellSouth Telecommunications, Inc.
South Carolina Public Service Commission
Docket No. 2001-65-C
Late-Filed Exhibit
June 20, 2001
Hearing Exhibit No. 19
Page 1 of 1 with Attachment

REQUEST: Please provide the back-up information for the work times associated with the Physical Collocation Application Fee.

RESPONSE: Please see the attached document.

Pursuant to Commissioner Bradley's request of BellSouth witness Bernard Shell during the hearing in this matter, the following is a breakdown of the activities BellSouth must undertake to respond to a collocation application and the work times assigned to each in BellSouth's cost study. These inputs reflect the experience of BellSouth subject matter experts in responding to collocation applications and are forward-looking estimates.

PHYSICAL COLLOCATION Application Fee - Initial

1. Account Team Collocation Coordinator (ATCC) JG58 - Eleven hours

a. Initiation of Application – Three hours

- Initial review of an application in order to validate integrity of data (e.g., power request closely matches equipment power drain) and discussion with applicant
- Explanation of application contents and its impact to the overall project with applicant Includes any clarification of application information necessary for the interdepartmental coordinators

b. Review of Physical Collocation Agreement - Two hours

- Review of applicant's specific terms, conditions and rates for physical collocation
- Clarification of physical agreement terms and conditions for evaluation of their impact specific to the project
- Identification of impacting terms and conditions to interdepartmental coordinators (for example, unique time frames)

c. Processing of Application - Two hours

- Identify Interdepartmental coordinators by name, address, office telephone number and fax telephone number specific to selected location
- Assign a reference number

- Request service order issuance for establishing a Billing Account Number (BAN)
- Process application payment to BellSouth billing center
- Prepare and distribute cover list and identify any critical concerns relating to the particular application (e.g., the CLEC may truly desire significantly more power than required with the current application and noting this will speed up review process). Review the application determining final acceptance of a Bona Fide Application (include correct prepaid fee, correct listing of equipment data, wiring requirements, signatures, etc.)
- Assemble the Bona Fide Application Package for distribution to the Interdepartmental Coordinators
- Update Master data base for corporate compliance reporting

d. Gathering Response Data - Two hours

- Respond to questions from the Interdepartmental Coordinators and review the responses for clarification. For example, because of the variety of physical collocation agreements in effect, the ATCC will still need to verify the response provided by the interdepartmental team matches the terms of the CLEC's agreement.

e. Preparation and Distribution of Response - Two hours

- Update response information from the Interdepartmental Coordinators and prepare a response for the customer
- Review of terms, conditions and rates and translation of Interdepartmental response data into written contract commitments
- Prepare written response and cover letter
- Determine expiration date to place Bona Fide Firm Order
- Assemble response package (including cover letter, response, BSTEI-1-P forms for placing Bona Fide Firm Order, listings of BellSouth Certified Vendors)Account Team Collocation Coordinator

2. ATCC – Clerical WS 10 - One hour

- Clerical time for distribution of the application to the field and distribution of the hard copy of the response to the customer

3. Customer Point of Contact - One-half hour

- Receive and review Fee Processing Request form
- Verify customer credit information
- Manually enter Access Service Request (ASR) with customer information
- Query mechanized system for Billing Account Number assignment
- Generate Service Order Work Aid (SOWA) and enter the appropriate application information
- Issue service order to establish billing account for processing the Application Fee
- Follow up to ensure completion of service order
- Disconnect 0.03 hours (1.8 minutes)

4. Interexchange Network Access Coordinator (INAC) - 20 hours

- Receive and evaluate inquiry
- Contact Area provisioning team, if required
- Initiate & facilitate follow-up planning meetings with Area work groups & customer, if required
- Work with the Area team to develop the plan, establish tentative schedules and identify major construction items that will affect critical dates
- Serve as technical consultant to Area Provisioning team, Account Team coordinator and customer for identification and resolution of issues
- Interface with Regulatory and Collocation Project Team for policy development and issue resolution

- Receive inquiry response data from Area team
- Analyze data and determine project schedule Resolve Network issues
- Review response data and notify Account Team Coordinator that inquiry is complete

5. Common Systems Capacity Management (CSCM) - Eight hours

- Review application for space, power and cabling requirements
- Perform site visit to verify space availability and inspect space conditions
- Coordinate space selection and preparation requirements with Property and Services Management
- Coordinate cable and power requirements with Circuit and Power Capacity Management
- Complete application response data related to above items

6. Circuit Capacity Management (CCM) - Eight hours

- Receive and review Service Inquiry
- Interface with INAC and account team to discuss and respond to application
- Interface with CSCM and other network groups to discuss and respond to application

7. Outside Plant Engineering - One-half hour

- Determine availability of duct space, research options for point of interconnect and submit inquiry response

8. Corporate Real Estate and Services (CRES) – JG 58 - 1 hour

- Act as a single point of contact for questions, dates and information from ATCC and Parsons Engineering for building related work requirements, such as HVAC enhancements

- Approve work request
- Review drawings of the facility requested to determine current condition
- Receive inquiry and enter tracking data to system
- Monitor timely response to INAC
- Interact with other CRES team members on responses

9. Corporate Real Estate and Services (CRES) - JG 55 - 1/4 hour

- Enter work request which is required to authorize our consultants to determine estimates
- Establish authority number and route for approval

10. Parsons Engineering - \$1,013 Nonrecurring expense

- Perform CO survey and cost estimate for CLEC response

11. Power Capacity Management (PCM) - 1 hour

- Review requests and determines what work is needed in order to ensure sufficient power capacity exists based on application

BellSouth Telecommunications, Inc.
South Carolina Public Service Commission
Docket No. 2001-65-C
Late-Filed Exhibit
June 21, 2001
Hearing Exhibit No. 30
Page 1 of 1 with Attachment

REQUEST: Please provide the video used during Mr. Greer's summary.

RESPONSE: A copy of the video illustrating BellSouth technicians removing load coils from BellSouth facilities ("loop conditioning"), which was shown at the hearing during Mr. Greer's summary, is submitted as Late-filed Exhibit No. 30.

Darra W. Cothran, Esquire
Carolyn C. Matthews, Esquire
Woodward, Cothran & Herndon
1200 Main Street, 6th Floor
Post Office Box 12399
Columbia, South Carolina 29211
(MCI WorldCom Network Service, Inc.
MCI WorldCom Communications and
MCI metro Access Transmission Services,
Inc.)
(Hand Delivery)

Russell B. Shetterly, Esquire
Haynsworth, Marion, McKay & Guerard, L.L.P.
Post Office Drawer 7157
Columbia, South Carolina 29202
(ACSI)
(Hand Delivery)

John F. Beach, Esquire
John J. Pringle, Jr., Esquire
Beach Law Firm
1321 Lady Street, Suite 310
Post Office Box 11547
Columbia, South Carolina 29211-1547
(TriVergent, AIN and SCPCA)
(Hand Delivery)

Marsha A. Ward, Esquire
Kennard B. Woods, Esquire
MCI WorldCom, Inc.
Law and Public Policy
6 Concourse Parkway, Suite 3200
Atlanta, Georgia 30328
(MCI)
(U. S. Mail)

Frank R. Ellerbe, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
1901 Main Street, Suite 1500
Post Office Box 944
Columbia, South Carolina 29202
(NewSouth Communications Corp.)
(Hand Delivery)

Robert Carl Voight
Senior Attorney
141111 Capital Blvd.
Wake Forest, NC 27587-5900
(Sprint/United Telephone)
(U. S. Mail)

Marty Bocock
Director of Regulatory Affairs
1122 Lady Street, Suite 1050
Columbia, South Carolina 29201
(Sprint/United Telephone Company)
(Hand Delivery)

Henry C. Campen, Jr., Esquire
Parker Poe Adams & Bernstein LLP
150 Fayetteville Street Mall
Suite 1400
Raleigh, North Carolina 27602
(Broadslate Networks of SC, Inc.
ITC^DeltaCom Communications, Inc.
KMC Telecom III, Inc.)
(U. S. Mail)

Faye A. Flowers, Esquire
Parker, Poe, Adams & Bernstein LLP
1201 Main Street, Suite 1450
Columbia, South Carolina 29202
(Broadslate Networks of SC, Inc.
ITC^DeltaCom Communications, Inc.
KMC Telecom III, Inc.)
(Hand Delivery)



Nyla M. Laney